

- The Commission should formalize an alternative dispute resolution mechanism, and should consider referring Section 255 complaints to the TAAC or a comparable advisory committee for evaluation and a recommended decision.⁴⁹
- The guidelines should encourage manufacturers to incorporate accessibility solutions into all their products, rather than individual parts of a product line, in order to integrate accessibility into the widest and most feature-rich set of products possible.⁵⁰
- The guidelines should retain the flexibility of the ADA’s “readily achievable” criterion and should not require individual products to be made accessible for all disabilities if doing so would “fundamentally alter” the product’s design or functionality.⁵¹

Based on our review of the draft TAAC guidelines, together with initial involvement on the committee and discussions with industry and disability representatives, Netscape believes that the final Access Board guidelines will in all likelihood meet each of these criteria. While there is much work still to be done in finalizing the TAAC guidelines, they appear to strike a reasonable balance between the needs of manufacturers for flexibility and non-intrusive record-keeping, the needs of consumers for accessibility and accountability, and the interests of the Commission in a defined method of deciding enforcement disputes. Indeed, unlike some of the parties

⁴⁹ Pacific Telesis Comments at iii.

⁵⁰ E.g., MATP Comments at 6.

⁵¹ Lucent Technologies Comments at 15.

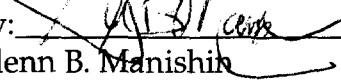
supporting a totally *ad hoc* complaint process, Netscape believes such an approach is doomed to failure and will in the long-term generate unnecessary, contentious and extremely expensive disputes over accessibility.

CONCLUSION

Accessibility of telecommunications services, equipment and CPE for people with disabilities is an important part of the Commission's responsibility for fostering universal service, universal design and universal access. Netscape looks forward to continuing its work with the TAAC and the disability community, and to improving accessibility for Netscape's own software products, the World Wide Web and the global Internet.

Respectfully submitted,

Peter F. Harter
Public Policy Counsel
Netscape Communications Corp.
[http://home.netscape.com/
pfh@netscape.com](http://home.netscape.com/pfh@netscape.com)
487 East Middlefield Road
Mountain View, CA 94043
415.937.3719

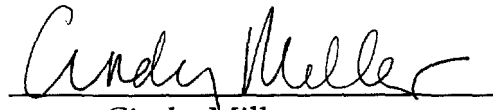
By: 
Glenn B. Manishin
Blumenfeld & Cohen - Technology Law Group
<http://www.technologylaw.com/>
info@technologylaw.com
1615 M Street, N.W.
Suite 700
Washington, DC 20036
202.955.6300

Attorneys for Netscape Communications Corporation

Dated: November 27, 1996

CERTIFICATE OF SERVICE

I, Cindy Miller, do hereby certify on this 27th day of November, 1996, that I have served a copy of the foregoing document via first class mail, postage prepaid, to the parties below:


Cindy Miller

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 832
Washington, D.C. 20554

Lawrence W. Katz
Bell Atlantic Telephone Companies
1320 North Court House Road
8th Floor
Arlington, VA 22201

Scott Marshall
Vice President, Governmental Relations
American Foundation for the Blind
Governmental Relations Group
1615 M Street, NW, Suite 250
Washington, DC 20036

Consortium For Citizens With Disabilities
c/o Jenifer Simpson
United Cerebral Palsy Associations
1660 L Street, NW, Suite 700
Washington, DC 200036

The Honorable Rachel B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 844
Washington, D.C. 20554

The Honorable James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 802
Washington, D.C. 20554

Gregg C. Vanderheiden, Ph.D.
Director
Trace Research & Development Center
S-151 Waisman Center
1500 Highland Ave.
Madison, WI 53705

Mary McManus
Director, Federal Public Affairs
Lucent Technologies
Suite 700
900 19th Street, NW
Washington, DC 200067

Alfred R. Lucas
Motorola, Inc.
Suite 400
1350 I Street, NW
Washington, DC 20005

Mary McDermott
United States Telephone Association
1401 H Street, NW
Suite 600
Washington, DC 20005

Judy Brewer
Project Director
Massachusetts Assistive Technology
Partnership
Children's Hospital
1295 Boylston Street, Suite 310
Boston, MA 02215

Jack Krumholtz
Law and Corporate Affairs Department
Microsoft Corporation
Suite 600
5335 Wisconsin Ave., NW
Washington, DC 20015

David A. Bolnick, Ph.D.
Accessibility and Disabilities Group
Microsoft Corporation
One Microsoft Way
Redmond, WA 98052

Stanley M. Gorinson
Preston Gates Ellis & Rouvelas Meeds
Suite 500
1735 New York Ave., NW
Washington, DC 20006

Colleen Boothby
Levine, Blaszak, Block & Boothby
1300 Connecticut Ave., NW
Suite 500
Washington, DC 20036

Karen Peltz Strauss
Legal Counsel for Telecommunications Policy
National Association of the Deaf
814 Thayer Avenue
Silver Spring, MD 20910

Marlin D. Ard
Pacific Telesis Group
140 New Montgomery Street
Room 1526
San Francisco, CA 94105

Campbell L. Ayling
NYNEX Telephone Companies
1111 Westchester Ave.
White Plains, NY 10604

George A. Hanover
Joe Peck
Consumer Electronics Manufacturers
Association
2500 Wilson Blvd.
Arlington, VA 22201

Barbara Raimondo
Consumer Action Network
8719 Colesville Road #300
Silver Spring, MD 20910

Timothy J. Cooney
Sutherland, Asbill & Brennan
1275 Pennsylvania Ave., NW
Washington, DC 20004

Peter J. Jacoby
AT&T Corp.
295 North Maple Ave.
Room 3245H1
Basking Ridge, NJ 07920

Jim Tobias
Inclusive Technologies
334 Main Street, Suite 141
Matawan, NJ 07747

Amie Amiot
American Speech-Language-Hearing
Association
10801 Rockville Pike
Rockville, MD 20852

Andrea D. Williams
Cellular Telecommunications Industry
Association
1250 Connecticut Ave., NW
Suite 200
Washington, DC 20036

James R. Hobson
Donelan, Cleary, Wood & Maser
1100 New York Ave., Suite 750
Washington, DC 20005

J. Paul Walters, Jr.
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101

Barry A. Freeman, Ph.D.
American Academy of Audiology
8201 Greensboro Drive, Suite 300
McLean, VA 22102

Donna M. Roberts
MCI Telecommunications Corp.
1801 Pennsylvania Ave., NW
Washington, DC 20006

Stephen J. Rosen
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Michael J. Barkley
161 N. Sheridan Ave. #1
Manteca, CA 95336

Dana Mulvany, MSW, LCSW
350 Budd Ave., #A1
Campbell, CA 95008

Joseph R. Cooney
Protection & Advocacy Program—University
Legal Services, Inc.
300 I Street, NW, Suite 202
Washington, DC 20002

Jo Waldron
5195 Fontaine Blvd.
Fountain, CO 80817

Joan Morton
Resource Center for the Deaf and Hard of
Hearing
Tulsa Community College
6111 East Skelly Drive
Tulsa, OK 74135

Donna L. Sorkin
Self Help for Hard of Hearing People, Inc.
7910 Woodmont Ave., Suite 1200
Bethesda, MD 20814

M. Robert Sutherland
BellSouth Corp.
Suite 1700
1155 Peachtree Street, NE
Atlanta, GA 30309

Mark J. Golden
Personal Communications Industry
Association
500 Montgomery Street, Suite 700
Alexandria, VA 22314

Michael B. Fingerhut
Sprint Corporation
1850 M Street, NW, 11th Floor
Washington, DC 20036

David C. Jatlow
Young & Jatlow
Suite 600
2300 N Street, NW
Washington, DC 20037

Brenda A. McNabb
GTE Railfone Incorporated
2809 Butterfield Road
Oak Brook, IL 60522

Jenifer Simpson
United Cerebral Palsy Associations
1660 L Street, NW, Suite 700
Washington, DC 200036

Jim Stovall
Narrative Television Network
5840 South Memorial Drive, Suite 312
Tulsa, OK 74145

James R. Fruchterman
Arkenstone, Inc.
555 Oakmead Parkway
Sunnyvale, CA 94086

Stephen L. Goodman
Halprin, Temple, Goodman & Sugrue
1100 New York Ave., NW
Suite 650, East Tower
Washington, DC 20005

International Transcription Service
2100 M Street - Room 140
Washington, D.C. 20037

Mark J. O'Connor
Piper & Marbury
1200 19th Street, NW
7th Floor
Washington, DC 20036

Kathryn Marie Krause
U S West, Inc.
1020 19th Street, NW
Washington, DC 20036

Rita McDonald
Wireless Bureau—Policy Division
Federal Communications Commission
2025 M Street, NW, Room 5202
Washington, DC 20554